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D. 2
PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION

AMEROCK CORPORATION, A SUBSIDIARY
OF THE NEWELL GROUP
ROCKFORD, ILLINOIS
ILD 000 806 190

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

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Resource Applications, Inc. (RAI) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Amerock Corporation (Amerock) facility in Rockford, Illinois. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The Amerock facility is an assembly and finishing plant for window hardware. Operations include: parts cleaning, phosphating, chromating, painting, and lacquering. The facility generates and manages the following waste streams: spent methyl ethyl ketone (F005), waste chromate (D002, D007), waste oil, waste phosphate, and cleaner waste. The facility has operated at its current location since 1929. The facility occupies 0.5 acre in a light-industrial, commercial, residential, mixed-use area, and employs about 350 people. The facility's regulatory status is currently a small-quantity generator. Since 1929, Amerock has been located at the 416 South Main Street plant. The facility began operations on the 13th floor of the building. In the 1960's, Amerock purchased the building and began utilizing all 13 floors. In 1987, Amerock was purchased by the Newell Group and is now a subsidiary to them. In 1989, Amerock closed three drum storage areas (S01) that stored hazardous waste for greater than 90 days. Two of the areas, SWMU 7 and SWMU 8, no longer store hazardous waste. The third area, SWMU 5, currently stores hazardous waste for less than 90 days. The Illinois Environmental Protection Agency (IEPA) approved closure for the drum storage areas on December 4, 1989.

The PA/VSI identified the following eight SWMUs at the facility:

Solid Waste Management Units

1. Hazardous Waste Satellite Accumulation Areas
2. Parts Coating Waste Drum Storage Area
3. Waste Oil Drum Storage Area
4. Nonhazardous Waste Satellite Accumulation Areas
5. Hazardous Waste Container Storage Area
6. Spent Battery Storage Area
7. Former Drum Storage Area #1
8. Former Drum Storage Area #2

No areas of concern were identified at the facility.

The potential for release to ground water is low. There are no underground storage tanks located on-site. All hazardous waste storage units are located indoors, on the sixth floor of the building. The floor drains in the building are plugged.

The potential for release to surface water is low. All hazardous waste storage units are located on the sixth floor of the building. The floor drains in the building are plugged. The nearest surface water body is the Rock River located one block east of the facility. The river is used for recreational purposes.

The potential for release to air is low. Containers and drums are properly sealed. The electrostatic paint booths have a vent system that filters the drawn-in air.

The potential for release to on-site soils is low. There are no hazardous waste storage areas located outdoors. Drums and containers are properly sealed and floor drains are plugged. There are no underground storage tanks located on-site.

At the time of the VSI, RAI observed waste oil on the floor the the Waste Oil Drum Storage Area (SWMU 3). RAI recommends that the waste oil be cleaned up. RAI recommends no other action for this facility at this time.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 Team member, provided the necessary assistance to complete the PA/VSI activities for the Amerock Corporation (Amerock), a subsidiary of the Newell Group.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Amerock facility in Rockford, Illinois. The PA was completed on December 13, 1991. RAI gathered and reviewed information from Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files.

The VSI was conducted on December 17, 1991. It included interviews with Amerock facility representatives and a walk-through inspection of the facility. Eight SWMUs and no AOCs were identified at the facility.

RAI completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and 12 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The Amerock facility located at 416 South Main Street in Rockford, Winnebago County, Illinois (latitude 42°16'06"N and longitude 89°06'40"W), as shown in Figure 1. The facility occupies approximately 0.5 acre in a light-industrial, commercial, residential, and mixed-use area.

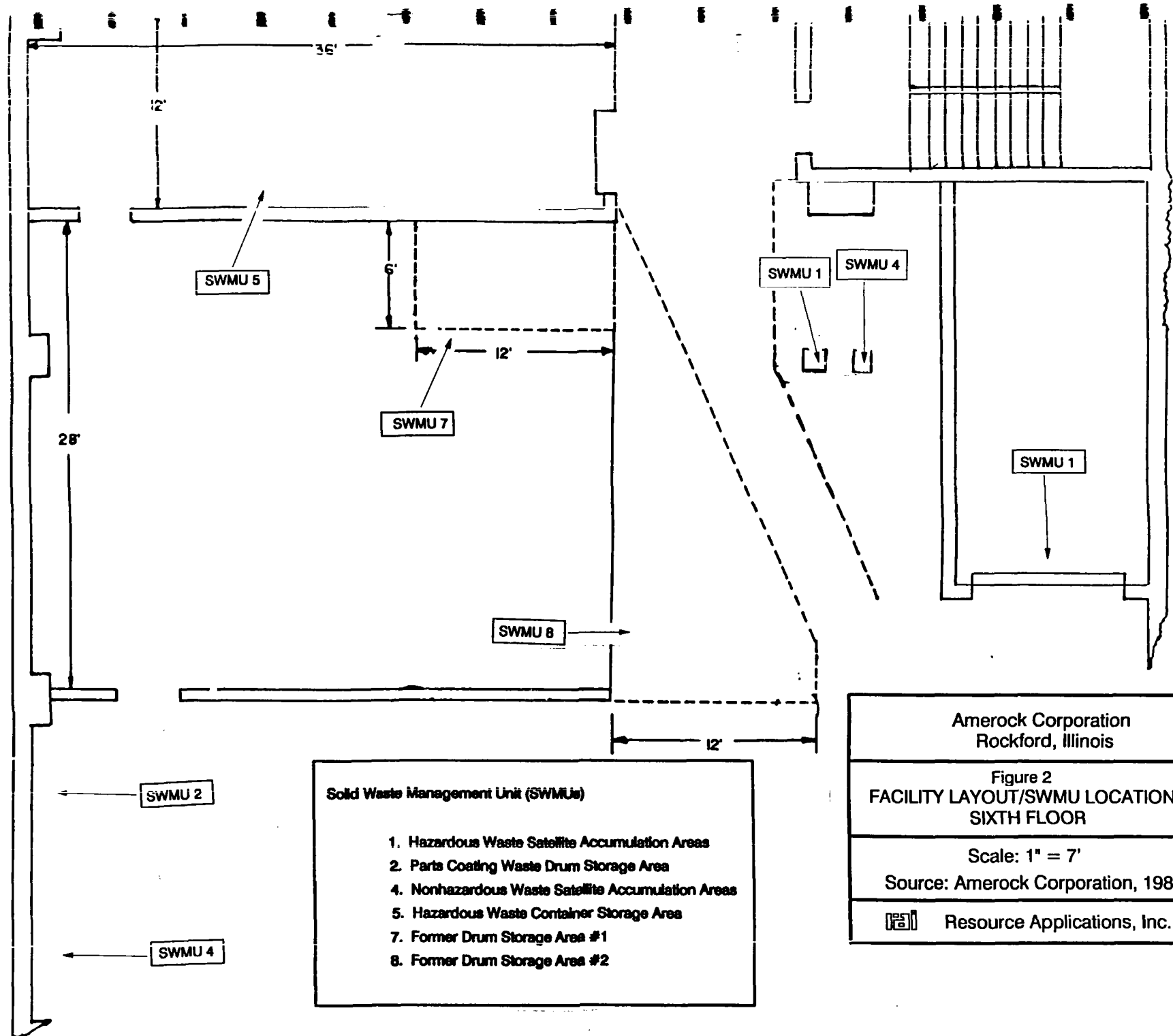
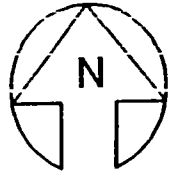
The Amerock facility is bordered on the north and south by commercial businesses, on the west by commercial businesses and residential areas, and on the east by the Rock River and then residential areas beyond the river.

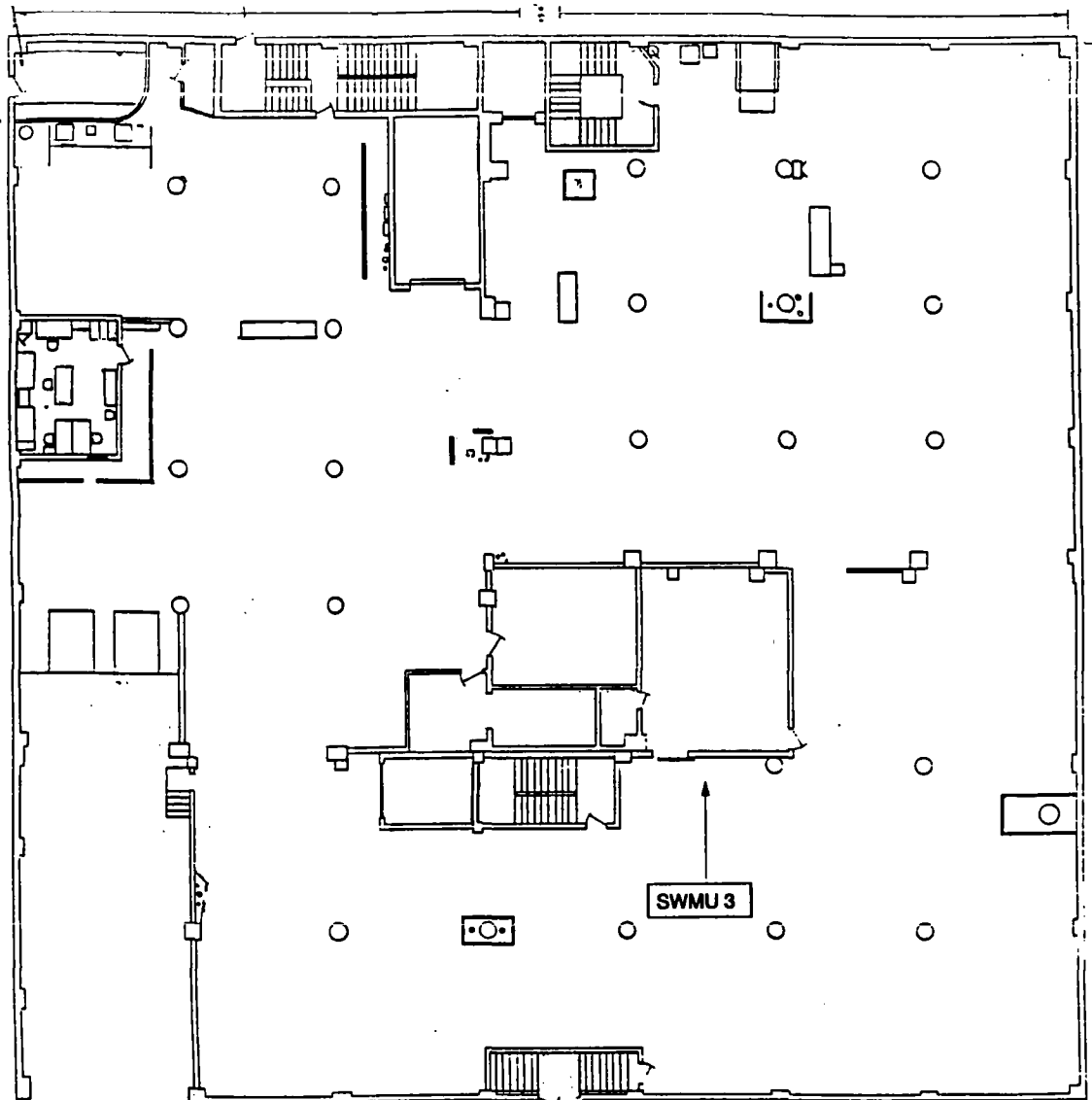
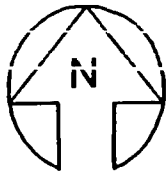
2.2 FACILITY OPERATIONS

The Amerock facility assembles window hardware with operations including: parts cleaning, phosphating, chromating, painting, and lacquering. The type of metal (brass, steel, or zinc) for the window hardware determines if it is to be treated in a phosphate or chromate bath process. The hardware is then rinsed and conveyed to dryers. Next, the hardware is painted in electrostatic paint booths and then dried in an oven. The window hardware is then stored inside the building.

The facility has operated at its current location since 1929 and employs about 350 people. The facility consists of one 13-story building occupying 24,180 square feet. The phosphating, chromating, and painting processes are performed on the sixth floor. The facility layout of the sixth floor is shown in Figure 2. The shipping and receiving area and the Waste Oil Drum Storage Area (SWMU 3) is located on the second floor, as shown in Figure 3. General maintenance is done on the first floor. The facility layout of the first floor is shown in Figure 4.

Wastes that are generated from the chromate bath process and the painting process are accumulated on the sixth floor. Methyl ethyl ketone (MEK) is accumulated in a 5-gallon pan (SWMU 1) in the paint spray booths located southwest of the chromate bath process. Waste chromate is accumulated in a 55-gallon drum (SWMU 1). Both waste MEK and waste chromate are then stored





Solid Waste Management Unit (SWMUs)

3. Waste Oil Drum Storage Area

Amerock Corporation
Rockford, Illinois

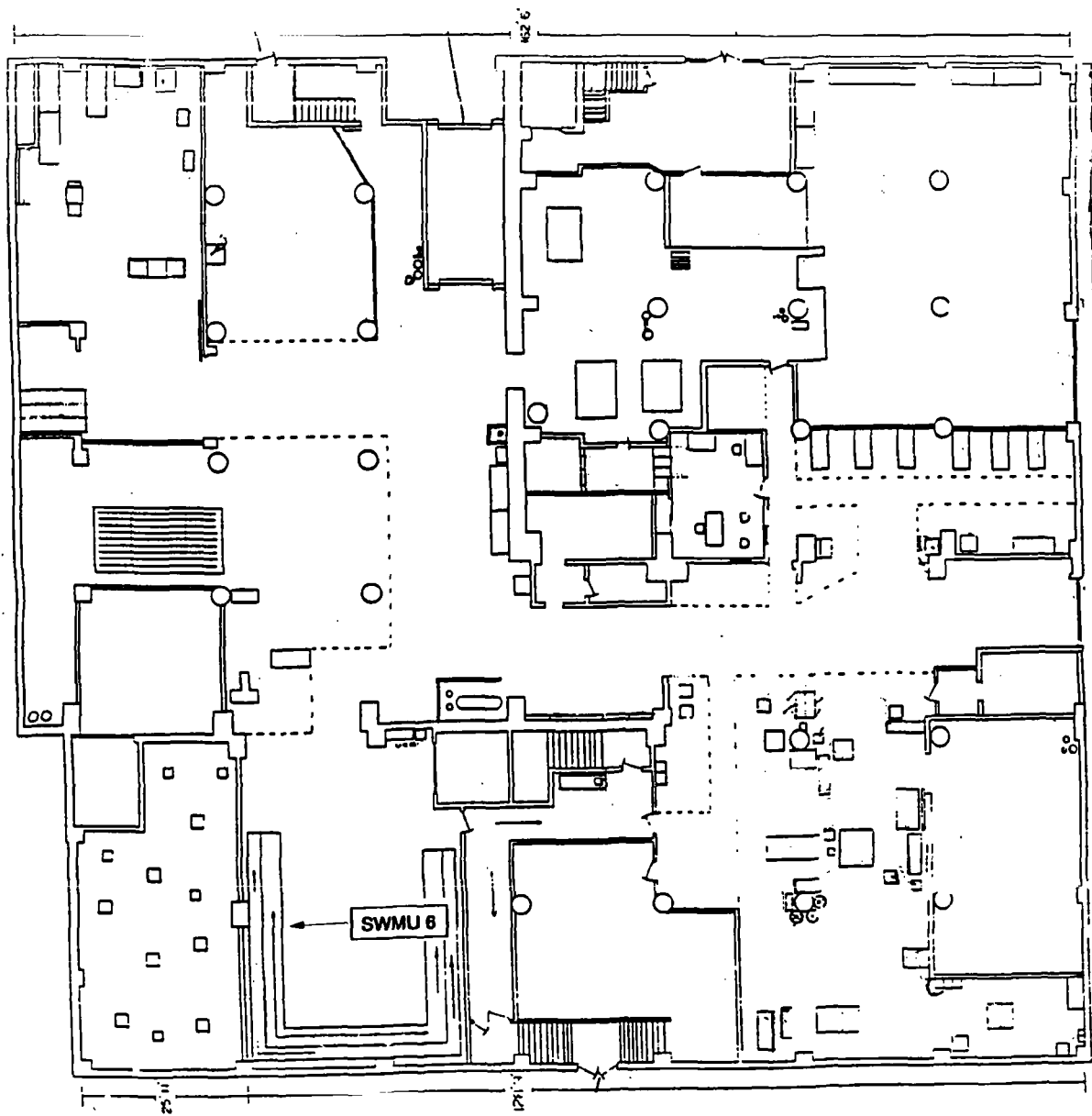
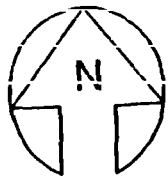
Figure 4
FACILITY LAYOUT/SWMU LOCATIONS
FIRST FLOOR

Scale: 1" = 22'

Source: Amerock Corporation, 1989b



Resource Applications, Inc.



Solid Waste Management Unit (SWMUs)

6. Spent Battery Storage Area

Amerock Corporation
Rockford, Illinois

Figure 3
FACILITY LAYOUT/SWMU LOCATIONS
SECOND FLOOR

Scale: 1" = 22'

Source: Amerock Corporation, 1989b



Resource Applications, Inc.

in the Hazardous Waste Container Storage Area (SWMU 5). Nonhazardous phosphate waste generated from the phosphate bath process, and nonhazardous ash generated from the burn-off oven are accumulated in satellite areas on the sixth floor in Nonhazardous Waste Satellite Accumulation Areas (SWMU 4). The walls of the paint spray booths are coated with a special paint that peels. Overspray from the painting process is peeled off the walls of the paint spray booths and stored in 55-gallon drums. A vent system pulls the air from the paint spray booths through filters. The waste filters are removed and disposed of with the peeled-off paint and ash. All three wastes are stored in the Parts Coating Waste Drum Storage Area (SWMU 2). Waste oil from machines is stored on the second floor in the Waste Oil Drum Storage Area (SWMU 3). Spent forklift batteries are stored on the first floor in the Spent Battery Storage Area (SWMU 6). Facility SWMUS are identified in Table 1.

In 1929, Amerock operated out of the 13th floor of the 416 South Main Street Building. Eventually, in the 1960's, Amerock purchased the building and occupied all floors. In 1987, the Newell Group purchased Amerock, which became a subsidiary to them. Past operations at the plant included electroplating, molding, zinc die casting of parts, and stamping of steel parts. These operations were moved to another Amerock plant on Auburn Street in Rockford in 1976. The facility also used to clean parts with Stoddard solvents; this process ceased in 1989.

2.3 WASTE GENERATING PROCESSES

The primary waste streams generated at the Amerock facility are spent MEK (F005), spent chromic acid (D002, D007), chromate sludge (D002, D007), waste phosphate and cleaner, parts coating waste, waste oil, and spent batteries. These wastes are generated during the cleaning, phosphating, chromating, and painting of window hardware. Waste oil is generated from maintenance of the assembly and riveting machines. The spent batteries are removed from the forklifts. Wastes generated at the facility are discussed below and are summarized in Table 2. Annual generation rates presented are based on 1990 and 1991 waste generation data.

Cleaning of the electrostatic paint booths' disks and lines generates approximately 400 gallons of spent MEK (F005) annually. This waste is accumulated in Hazardous Waste Satellite Accumulation Areas (SWMU 1).

Zinc parts are dipped in a chromate bath after being cleaned and rinsed. This process generates liquid and solid chromate waste. Every 5 months the liquid is decanted into a 55-gallon drum and accumulated in SWMU 1. Approximately 1,045 gallons of liquid chromate waste is generated annually.

TABLE 1
SOLID WASTE MANAGEMENT UNITS (SWMU)

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit*</u>	<u>Status</u>
1	Hazardous Waste Satellite Accumulation Areas	No	Active
2	Parts Coating Waste Drum Storage Area	No	Active
3	Waste Oil Drum Storage Area	No	Active
4	Nonhazardous Waste Satellite Accumulation Areas	No	Active
5	Hazardous Waste Container Storage Area	Yes	Active, less than 90 day storage; RCRA closure of greater than 90-day storage completed in 1989
6	Spent Battery Storage Area	No	Active
7	Former Drum Storage Area #1	Yes	Inactive, RCRA closure completed in 1989
8	Former Drum Storage Area #2	Yes	Inactive, RCRA closure completed in 1989

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit.

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code</u>	<u>Source</u>	<u>Primary Management Unit*</u>
MEK/F005	Electrostatic Paint Booths	SWMUs 1, 5
Chromic Acid Solution and Chromate Sludge/D002, D007	Chromating Zinc Parts	SWMUs 1, 5, 8
Spent Alkaline Cleaner /D002	Cleaning and Phosphate Bath Process	SWMU 7
Waste Paint/F005	Electrostatic Paint Booths	SWMU 7
Phosphoric Acid/D002	Phosphate Bath Process	SWMU 8
Phosphate and Cleaner Waste/NA	Cleaning and Phosphate Bath Process	SWMUs 4, 2
Burn-Off Oven Ash/NA	Burn-Off Oven	SWMUs 4, 2
Paint Filters/NA	Electrostatic Paint Booths	SWMU 2
Peel-Off Paint/NA	Electrostatic Paint Booths	SWMU 2
Waste Oil/NA	Assembly and Riveting Machines	SWMU 3
Spent Batteries/NA	Truck Lifts	SWMU 6

Note:

- * Primary management unit refers to a SWMU that currently manages or formerly managed the waste. NA (Not Applicable) means that the waste is nonhazardous.
-

The chromate waste is stored in the Hazardous Waste Container Storage Area (SWMU 5) and transported off-site to the Auburn Street plant to recover the zinc. After the zinc has been reclaimed, the waste chromate liquid (D002, D007) is transported off-site and treated by FIW Laidlaw Environmental. Waste chromate sludge (D002, D007) is pumped into a 55-gallon drum and accumulated in SWMU 1. Approximately 20-25 gallons of waste chromate sludge is generated annually. The sludge is also transported to the Auburn plant to recover the zinc. The chromate sludge is then disposed of by Chemical Waste Management of Alsip, Illinois. Prior to 1987, waste chromate sludge (D002, D007) was stored in Former Drum Storage Area #2 (SWMU 8).

Nonhazardous phosphate waste is generated when the phosphate bath is cleaned. This is done every 6 months to 1 year. When the heating coils do not heat properly, the phosphate liquid is neutralized with sodium hydroxide to a pH of seven to 11 and dumped into the sewer. The coils are then descaled and rinsed into the sewer. Large, hard chunks of solid phosphate waste is accumulated in drums in Nonhazardous Waste Satellite Accumulation Areas (SWMU 4). Approximately 55 gallons of solid phosphate waste is generated annually. Chemical Waste Management of Alsip, Illinois disposes of this waste.

Mixed with the phosphate waste is the cleaner used to clean the window hardware before the chromate/phosphate bath process. Once a week, the cleaner is dumped from the tank into the sewer. The large chunks are accumulated with the phosphate waste in Nonhazardous Waste Satellite Accumulation Areas (SWMU 4). Phosphating of brass window hardware was eliminated as a process at the Amerock facility in December 1991. However, brass hardware is still cleaned and sent to lacquering.

Wastewater generated from the rinsing of the window hardware before, and after, the chromate or phosphate bath process is discharged into the sewer system. Amerock is not required by the Rockford Sanitary District to have a permit to dump wastewater into the sewer system. Amerock does monitor its wastewater daily for chromium and zinc levels.

Nonhazardous ash from the burn-off oven is accumulated in a Nonhazardous Waste Satellite Accumulation Area (SWMU 4) that is connected to the oven. The ash is then shovelled into 55-gallon drums and stored in the Parts Cleaning Waste Drum Storage Area (SWMU 2). Two other wastes are considered parts coating waste: the filters from the paint spray booths and the overspray on the walls of the paint booths. During the VSI, facility representatives stated that the filters passed Toxicity Characteristic Leaching Procedure (TCLP) testing and are manifested out as special waste. The walls of the paint spray booth are coated with a special paint that peels. Overspray from the paint sprayers is

then peeled off the walls and stored in 55-gallon drums in the Parts Coating Waste Drum Storage Area (SWMU 2). In 1991, 15 cubic yards of parts coating waste was generated and transported by Areas Disposal Inc. to Clinton Landfill in Clinton, Illinois. Waste oil is generated from the maintenance of the assembly and riveting machines. Waste oil is stored in the Waste Oil Drum Storage Area (SWMU 3) on the second floor. About 270 gallons of waste oil was generated in 1990 and transported by Beaver Oil Co. of Chicago, Illinois.

On the first floor, the spent batteries used for the lift trucks are stored in the Spent Battery Storage Area (SWMU 6) until they are picked up by the Battery Shop of Milwaukee, Wisconsin. In 1990, two batteries were picked up.

In the past, three drum storage units stored hazardous waste for greater than 90 days. The three drum storage units (SWMUs 5, 7, and 8) went through RCRA closure in 1989. Currently SWMU 5 stores hazardous waste for less than 90 days. The Former Drum Storage Area #1 (SWMU 7) used to store spent alkaline cleaner (D002) and waste paint (F005). Former Drum Storage Area #2 (SWMU 8) stored chromic acid solution (D002, D007) and phosphoric acid solution (D002).

2.4 HISTORY OF DOCUMENTED RELEASES

There is no history of documented releases at this facility.

2.5 REGULATORY HISTORY

Amerock submitted a Notification of Hazardous Waste Activity to EPA on August 12, 1980. The facility submitted a RCRA Part A permit application to EPA in November 1980. This application listed the following process code and capacity: a drum storage unit (S01) with a 1,210-gallon capacity. The application listed the following waste codes: F017, D002, and D004 (Amerock, 1980). An amended Part A permit was submitted to EPA on April 23, 1987. The following waste codes were listed D002/D007 and D002 (Amerock, 1987).

The facility has closed the following units: Hazardous Waste Container Storage Area (SWMU 5), the Former Drum Storage Area #1, (SWMU 7) and the Former Drum Storage Area #2 (SWMU 8). All three went through RCRA closure in 1989 (IEPA, 1989d). The facility currently operates as a small-quantity generator, storing wastes for less than 90 days.

In the past, Amerock has had RCRA compliance problems. Numerous inspections have been performed by IEPA at this facility. Amerock has had problems with its contingency plan and other paperwork violations (IEPA, 1982, 1988a, 1988b). On March 21, 1988, Amerock was sent a Compliance Inquiry Letter (CIL) by IEPA for the violation of using coating material with a VOC content above the 3.5 pound-per-gallon limit (IEPA, 1988a). In 1989, Amerock was sent a Pre-Enforcement Conference Letter for violations concerning storing and labeling of waste, and paperwork problems concerning the contingency plan (IEPA, 1989a). Amerock resolved most of its violations before IEPA performed a follow-up inspection in February 1989 (IEPA, 1989b). The rest of the violations were resolved in April 1989 (IEPA, 1989c). In November 1989, the Amerock Facility was inspected by IEPA to verify closure of storage facilities (IEPA, 1989d). Amerock received an IEPA closure certification letter on November 27, 1989 (IEPA, 1989e).

The facility is not required to have air permits and there is no history of odor complaints. The facility has a National Pollutant Discharge Elimination System (NPDES) permit. The NPDES permit is for run-off from the roof of the building.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Amerock facility.

2.6.1 Climate

The site is located in Rockford, Illinois in Winnebago County. Rockford is the location of the nearest U.S. National Weather Service office. With no significant topographical barriers to the airmass flow, the climate in the area is typically continental with cold winters; warm summers; and frequent short periodic fluctuations in the temperature, humidity, cloudiness, and wind direction (Ruffner and Bair, 1985). The average daily temperature is 47.8°F. The lowest average daily minimum temperature is 9.8°F in January. The highest average daily maximum temperature is 91.9°F in August. The prevailing wind direction is west-southwest and the average wind speed is 9.9 miles per hour. Average annual net precipitation is 5.44 inches. In winter, about one half of the precipitation, or 10 percent of the annual total, falls as snow. During the fall, winter, and spring, the pattern of precipitation tends to be more uniform over both time and distance, whereas in summer rainfall is often locally heavy and variable. The one year, 24-hour maximum rainfall recorded in the area over the last 25 years is 5.56 inches (Ruffner, 1985).

2.6.2 Flood Plain and Surface Water

The general direction of surface flow is toward the Rock River which lies immediately east of the facility and flows from north to south. The terrain has a slope of about 40 feet over a distance of 0.8 mile, providing effective relief for surface runoff. The facility locale is classified as a Zone A flood plain, that is, an area with a greater than 1 percent probability of flooding in any given year (FEMA, 1982).

2.6.3 Geology and Soils

Winnebago County is characterized by broad, rolling glaciated uplands that rise 100 to 200 feet above the valleys. The bedrock along the Rock River in the Rockford area lies buried beneath glacial deposits that are up to 300 feet thick (Anderson, 1967). These glacial deposits consist of sorted sand and gravel, with some finer material, and are known as valley train deposits (Berg, et al., 1984; Hackett and Bergstrom, 1956). The area's drainage characteristics are well graded so that surface water drains to edges of lots and finally into the storm water drainage system. As a result of construction, the water carrying capacity and permeability of the soil varies and is generally considered low to moderate. Runoff is considered moderate to high because of the steep slopes and the proximity of the Rock River.

The sand and gravel deposits in the Rock River Valley near the site are approximately 150 feet thick. The bedrock units underlying the glacial drift are marine sandstones, shales and dolomites, with an approximate total thickness of 2,000 feet. These rocks were deposited in the interval 520 to 400 million years ago, during the Cambrian, Ordovician and Silurian periods of the Paleozoic Era. The uppermost bedrock units in the vicinity of the facility are dolomites of the Galena-Platteville Formation, and these are underlain by the Glenwood-St. Peter Sandstones.

2.6.4 Ground Water

In northern Illinois ground water resources are available from four major aquifers, including: (1) sand and gravel aquifers in the glacial drift; (2) the dolomite aquifers, consisting of the Galena and Platteville Dolomite groups; (3) sandstone aquifers consisting of the Glenwood-St. Peter and Iron-ton-Galesville Sandstones; and, (4) the deeper Mt. Simon aquifers, consisting of the Mt. Simon Sandstones of the Eau Claire Formation (Berg, et al., 1984). In the site vicinity, excellent sand and gravel aquifers

occur. Municipal and industrial supplies are obtained from up to 150 feet of coarse sand and gravel (Hackett and Bergstrom, 1956).

The Galena-Platteville Dolomite group constitutes the uppermost bedrock in Winnebago County, and is probably the most widely used bedrock aquifer for domestic supplies, although the deeper sandstones are the most dependable source for large quantities of ground water. Because of their widespread distribution, consistent water yielding zones and shallow position, the dolomites provide water to most of the wells through joints and fractures close to the land surface. The average thickness of drift over the dolomite is 30 feet and the average depth of wells is 104 feet. Reported well yields range from 5 to 40 gallons per minute (gpm) with an average yield of 20 gpm. Penetration into dolomite from about 20 to 100 feet yields satisfactory water supplies. Where the drift cover is relatively thin, dolomite aquifers are very sensitive to contamination because water moves through the joints and fractures and there is little opportunity for filtration through granular materials (Berg, et al., 1984). In close proximity to the Rock River, the drift deposits are underlain directly by the St. Peter Sandstones, due to removal of the dolomites by erosion.

The St. Peter, Ironton-Galesville and the Elmhurst-Mt. Simon Sandstones furnish large quantities of water. Deeper aquifers are used only for larger municipal and industrial water supplies. The St. Peter Sandstone, the shallowest of the three aquifers, is used for domestic ground water supplies and is present at a depth of approximately 150 feet below the land surface near the site (Berg, et al., 1984). The general flow of ground water is from west to east towards the Rock River.

2.7 RECEPTORS

The Amerock facility occupies 0.5 acre in a light-industrial and mixed-use area in Rockford, Illinois. Rockford has a population of about 142,000.

The Amerock facility is bordered on the north and south by commercial businesses, on the west by commercial businesses and residential areas, and on the east by the Rock River and then residential areas beyond the river. The nearest school, St. Mary's, is located about 1 mile northwest of the facility. Facility access is controlled by a 24-hour guard security. There are two locked entrances to the building. Employees must use key cards to gain admittance.

The nearest surface water body, the Rock River, is located 1 block east of the facility and is used for recreational purposes.

Ground water is used for drinking and municipal water supply. The nearest drinking water wells are located 3 miles south of the facility. Unit well No. 4, located at 801 Marchesano Drive, is the closest drinking water well to the Amerock facility.

No sensitive environments or wetlands are located on-site, or within a 2-mile radius of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the eight SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and RAI observations.

SWMU 1

Hazardous Waste Satellite Accumulation Areas

Unit Description:

The Hazardous Waste Satellite Accumulation Areas are located on the sixth floor in the northeast and southeast corners. The area in the northeast corner accumulates waste chromate (D002, D007) in steel 55-gallon drums. The area is a 2-foot by 6-foot concrete area (see Photos 1 and 2). The area in the southeast corner is a 5-gallon pan that accumulates waste MEK (F005).

Date of Startup:

This unit began operation in 1991.

Date of Closure:

This unit is active.

Wastes Managed:

This unit manages waste chromate sludge (D002, D007), waste chromate liquid (D002, D007), and waste MEK (F005) in containers. Waste chromate from this unit is ultimately stored in SWMU 5 and then transported to the Auburn plant for zinc reclamation. Liquid waste is transported by FIW for disposal. The chromate sludge is also transported to the Auburn plant for zinc reclamation; it is then disposed of by Chemical Waste Management of Alsip, Illinois. Waste MEK (F005) is stored in SWMU 5 and transported off-site by Hydrate Chemical Co. and disposed of by Avganics Industries, Inc. of Cottage Grove, Wisconsin.

Release Controls:

The unit sits on a concrete floor and all floor drains are plugged.

History of Documented Releases:

No releases from this unit have been documented.

Observations: The area in the northeast corner contained two 55-gallon drums during the VSI. One drum was nearly empty and the other drum was half full. There were no cracks in the floor and the drums were properly sealed. The area in the southeast corner contained one 5-gallon pan. No evidence of release was noted.

SWMU 2

Parts Coating Waste Drum Storage Area

Unit Description: The Parts Coating Waste Drum Storage Area is located on the west side of the sixth floor of the building. The unit stores parts coating waste until it is shipped off-site for disposal. The area measures 10 feet by 20 feet. The unit is made of concrete with a berm sloping to the south (see Photo 7).

Date of Startup: This unit began operation around 1980.

Date of Closure: The unit is active.

Wastes Managed: This unit manages nonhazardous parts coating waste which consists of: ash from the oven, used paint filters, and peel-off paint from paint spray booths in containers. Wastes from this unit are ultimately transported by Areas Disposal Inc. to Clinton Landfill in Clinton, Illinois.

Release Controls: This unit sits on concrete with a berm sloping up to the south. All floor drains are plugged in the building.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit contained approximately twenty-three 55-gallon drums during the VSI. All drums were properly sealed and no cracks in the pavement were visible. No evidence of release was noted.

SWMU 3**Waste Oil Drum Storage Area**

Unit Description: The Waste Oil Drum Storage Area is located on the second floor of the building and is used to store waste oil. The area measures 21 feet by 26 feet. The unit is made of a concrete floor with a plugged drain in the center (see Photos 9 and 10).

Date of Startup: This unit began operation around 1970.

Date of Closure: The unit is active.

Wastes Managed: This unit manages nonhazardous waste oil from the assembly and riveting machines. Wastes from this unit are ultimately picked up for disposal by Beaver Oil Co. in Chicago, Illinois.

Release Controls: The unit has a concrete floor with a plugged drain in the center of the room.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit contained nine 55-gallon drums during the VSI. Three of the drums were open and accumulating waste oil. The rest of the drums were properly sealed. There was a pool of waste oil in the center of the room above the plugged drain.

SWMU 4**Nonhazardous Waste Satellite Accumulation Areas**

Unit Description: The Nonhazardous Waste Satellite Accumulation Areas are located on the sixth floor of the building. The areas accumulate nonhazardous ash, phosphate waste, and cleaner waste. The ash area measures 2 feet by 4 feet. The phosphate and cleaner area measures 2 feet by 6 feet. The ash area is made of metal and is part of the oven. The phosphate and cleaner area has a concrete floor where the steel drums accumulate waste (see Photos 2 and 3).

Release Controls:	No floor drains are in the area. A berm is located at the entrance of the room. There are no visible cracks in the floor.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, numerous product paint containers and many 55-gallon drums were observed in the area. There was some staining on the floor of the unit.

SWMU 6 Spent Battery Storage Area

Unit Description:	The Spent Battery Storage Area is located on the first floor of the building. The unit stores spent batteries and measures 2 feet by 15 feet. The unit is made of a wood block floor with creosote poured over it (see Photo 8).
-------------------	--

Date of Startup:	The unit began operation in 1982.
------------------	-----------------------------------

Date of Closure:	This unit is active.
------------------	----------------------

Wastes Managed:	This unit manages spent batteries. Wastes from this unit are ultimately picked up by the Battery Shop of Milwaukee, Wisconsin.
-----------------	--

Release Controls:	No floor drains are in the area. Batteries are placed on wood skids.
-------------------	--

History of Documented Releases:	No releases from this unit have been documented.
---------------------------------	--

Observations:	At the time of the VSI, the area contained four batteries stored on wooden skids waiting to be recharged. No evidence of release was noted.
---------------	---

SWMU 7 Former Drum Storage Area #1

Unit Description:	The Former Drum Storage Area was located on the sixth floor of the building. The unit formerly stored spent alkaline cleaner (D002) and waste paint (F005) for greater than 90 days. The unit measures 12 feet
-------------------	--

by 36 feet and occupied a corner of the room. The unit has a concrete floor (see Photo 5).

Date of Startup: The unit began operation prior to 1980.

Date of Closure: The unit has been inactive since 1987, and was formally RCRA closed in 1989.

Wastes Managed: This unit managed spent alkaline cleaner (D002) and waste paint (F005) in containers.

Release Controls: This unit is closed.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit contained nothing. No evidence of release was noted.

SWMU 8 Former Drum Storage Area #2

Unit Description: The Former Drum Storage Area was located on the sixth floor of the building. The unit formerly stored chromic acid (D002, D007), and phosphoric acid (D002), in 55-gallon steel drums for greater than 90 days. The unit measures 28 feet by 12 feet triangular area. The unit consisted of a concrete floor (see Photo 4).

Date of Startup: This unit began operation prior to 1980.

Date of Closure: This unit has been inactive since 1987, and was formally RCRA closed in 1989.

Wastes Managed: The unit managed chromic acid (D002, D007) and phosphoric acid (D002) in containers.

Release Controls: This unit is closed.

History of Documented
Releases:

No releases from this SWMU have been documented.

Observations:

The unit contained empty drums and about ten rolls of paper. No evidence of a release was noted.

4.0 AREAS OF CONCERN

RAI did not identify any AOCs during the PA/VSI. All storage areas have sound containment and the facility has no documented release history.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified eight SWMUs at the Amerock facility. Background information on the facility's location, operations, waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU. Table 3 identifies the SWMUs at the Amerock facility and suggested further actions.

SWMU 1 Hazardous Waste Satellite Accumulation Areas

Conclusions: The areas are located within the facility building and accumulate waste chromate (D002, D007) and spent MEK (F005).

The unit has a low potential for release to ground water, surface water, air, and on-site soil. All the drains are plugged in the building. Any release would have to travel six stories to reach ground water, surface water, and on-site soil. Drums are properly sealed, so the release potential to air is low.

Recommendations: RAI recommends no further action at this time.

SWMU 2 Parts Coating Waste Drum Storage Area

Conclusions: This unit currently stores special waste in 55-gallon drums on the sixth floor of the building.

The unit has a low potential for release to ground water, surface water, air, and on-site soil. All floor drains are plugged in the building. Any release would have to travel six stories to reach ground water, surface water and on-site soil. Drums are properly sealed, so release potential to air is low.

Recommendations: RAI recommends no further action at this time.

TABLE 3
SWMU SUMMARY

<u>SWMU</u>	<u>Operational Dates</u>	<u>Evidence of Release</u>	<u>Suggested Further Action</u>
1. Hazardous Waste Accumulation Areas	1991 to present	None	No further action at this time
2. Parts Coating Waste Drum Storage Area	1980 to present	None	No further action at this time
3. Waste Oil Drum Storage Area	1970 to present	Waste oil pooled in center of room.	Clean up pooled oil around drain
4. Nonhazardous Waste Satellite Accumulation Areas	1980 to present	None	No further action at this time
5. Hazardous Waste Container Storage Area	Prior to 1980 (RCRA Regulated) 1987 to present (not RCRA Regulated)	Staining on floor.	No further action at this time
6. Spent Battery Storage Area	1982 to present	None	No further action at this time
7. Former Drum Storage Area #1	Prior to 1980	None	No further action at this time
8. Former Drum Storage Area #2	Prior to 1980	None	No further action at this time

SWMU 3**Waste Oil Drum Storage Area**

Conclusions: This unit stores waste oil in 55-gallon drums in a 21-foot by 26-foot room on the second floor with a plugged floor drain in the center.

The unit has a low potential for release for ground water, surface water, air, and on-site soils. Any release would have to travel two stories to reach ground water, surface water, and on-site soil. Drums are properly sealed, so the release potential to air is low.

Recommendations: RAI recommends that released waste oil that accumulates around the plugged floor drain be cleaned up.

SWMU 4**Nonhazardous Waste Satellite Accumulation Areas**

Conclusions: This unit is indoors and accumulates burn-off oven ash, phosphate, and cleaner waste on the sixth floor of the building.

The unit is indoors and has a low potential for release to ground water, surface water, air, and on-site soil. The ash is contained in a tray and the phosphate cleaner waste is stored in closed 55-gallon drums, so the release potential to air is low.

Recommendations: RAI recommends that no further action be taken at this time.

SWMU 5**Hazardous Waste Container Storage Area**

Conclusions: This unit stores hazardous waste for less than 90 days on the sixth floor. The unit has a concrete floor with a berm at the entrance of the room. The room is kept closed by a metal door.

The unit has a low potential for release to ground water, surface water, air, and on-site soil. The unit is kept closed and any release would be contained by the berm at the entrance of the room. A release would have to travel six floors to

reach on-site soil, ground water, or surface water. Drums and containers are properly sealed, so the release potential to air is low.

Recommendations: RAI recommends no further action at this time.

SWMU 6 Spent Battery Storage Area

Conclusions: This unit is located on the first floor, in the shipping and receiving area. The batteries are stored on wooden skids.

The unit has a low potential for release to ground water, surface water, air, and on-site soil. The floor is made of wood block with creosote poured over it. The surface appeared sound.

Recommendations: RAI recommends no further action at this time.

SWMU 7 Former Drum Storage Area #1

Conclusions: This unit went through RCRA closure in 1989. The unit previously stored hazardous waste for greater than 90 days.

The unit has a low potential for release to ground water, surface water, air, and on-site soil. The unit has not stored any product or waste since closure.

Recommendations: RAI recommends no further action at this time.

SWMU 8 Former Drum Storage Area #2

Conclusions: This unit went through RCRA closure in 1989. The unit previously stored hazardous wastes for greater than 90 days.

The unit has a low potential for release to ground water, surface water, air, and on-site soil. The unit currently stores empty drums and rolls of paper.

Recommendations: RAI recommends no further action at this time.

REFERENCES

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- IEPA, 1988b. Routine ISS Inspection by IEPA, February 22.
- IEPA, 1989a. Pre-Enforcement Conference Letter, January 23.
- IEPA, 1989b. Follow-Up Inspection by IEPA, February 22.
- IEPA, 1989c. Resolved Violations, April 4.
- IEPA, 1989d. Closure Verification Inspection by IEPA, November 21.
- IEPA, 1989e. Closure Verification Letter, November 27.
- Ruffner, J.A. and E. Bair, 1985. Weather of U.S. Cities, Vol. 1 Gale Research Co., Detroit, Michigan.
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- U.S. Geological Survey, 1976. 7.5-minute Topographical Series: Rockford North Quadrangle.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE IL 02 SITE NUMBER ILD 000 808 190

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)
Amerock Corporation, a subsidiary of the Newell Group

02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
416 South Main Street

03 CITY
Rockford

04 STATE
IL

05 ZIP CODE
61101

06 COUNTY
Winnebago

07 COUNTY CODE

08 CENS DIST

09 COORDINATES: LATITUDE
42 18 06 N

LONGITUDE
089 06 40 W

10 DIRECTIONS TO SITE (Starting from nearest public road)

Take -30 west exit at Business 20 going west to Main Street; go south on Main Street; facility will be on the east side of the street.

III. RESPONSIBLE PARTIES

01 OWNER (if known)
Amerock Corporation, a subsidiary of the Newell Group

02 STREET (Business, mailing, residential)
4000 Auburn Street

03 CITY
Rockford

04 STATE
IL

05 ZIP CODE
61125

06 TELEPHONE NUMBER
(815) 963-9631

07 OPERATOR (if known and different from owner)
Amerock Corporation

08 STREET (Business, mailing, residential)
416 South Main Street

03 CITY
Rockford

10 STATE
IL

11 ZIP CODE
61101

12 TELEPHONE NUMBER
(815) 963-9631

03 TYPE OF OWNERSHIP (Check one)

☒ A. PRIVATE

☐ B. FEDERAL:

(Agency name)

☐ C. STATE

☐ D. COUNTY

☐ E. MUNICIPAL

☐ F. OTHER

(Specify)

☐ G. UNKNOWN

04 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☒ A. RCRA 3010 DATE RECEIVED: 08 / 12 / 80
MONTH DAY YEAR

☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED:

/ /
MONTH DAY YEAR

☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 OFF SITE INSPECTION

BY (Check all that apply)

☒ YES DATE 12 / 17 / 91

☐ NO

☐ A. EPA

☐ B. EPA CONTRACTOR

☐ C. STATE

☐ D. OTHER CONTRACTOR

☐ E. LOCAL HEALTH OFFICIAL

☐ F. OTHER:

(Specify)

CONTRACTOR NAME(S): Resource Applications, Inc.

02 SITE STATUS (Check one)

☒ A. ACTIVE

☐ B. INACTIVE

☐ C. UNKNOWN

03 YEARS OF OPERATION

1929
BEGINNING YEAR

Present
ENDING YEAR

☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Hazardous wastes generated by Amerock include waste chromate and methyl ethyl ketone. Other wastes at the site include: spent batteries, waste oil, ash, and peel-off paint.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

None certified.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and incidents.)

☐ A. HIGH

☐ B. MEDIUM

☐ C. LOW

☐ D. NONE

(Inspection required promptly)

(Inspection required)

(Inspect on time-available basis)

(No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT

Kevin Perard

02 OF (Agency/Organization)

EPA Region 5

03 TELEPHONE NUMBER
(312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT

Laure Czajkowski

05 AGENCY

U.S. EPA

06 ORGANIZATION

Resource Applications, Inc.

07 TELEPHONE NUMBER

(312) 332-2230

08 DATE

12 / 14 / 91
MONTH DAY YEAR





POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND
INCIDENTS

I. IDENTIFICATION

01 STATE
IL

02 SITE NUMBER
ILD 000 808 190

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified. Wastes are stored in closed drums.

01 ☐ B. SURFACE WATER CONTAMINATION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ C. CONTAMINATION OF AIR

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified. Wastes are stored in closed drums.

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ E. DIRECT CONTACT

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ F. CONTAMINATION OF SOIL

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

03 AREA POTENTIALLY AFFECTED: _____
(Acres)

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ G. DRINKING WATER CONTAMINATION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

There is no evidence of drinking water contamination.

01 ☐ H. WORKER EXPOSURE/INJURY

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

03 WORKERS POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ I. POPULATION EXPOSURE/INJURY

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

There is no evidence of any population exposure/injury. The facility is locked and has a 24-hour guard security.



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND
INCIDENTS

I. IDENTIFICATION

01 STATE IL	02 SITE NUMBER ILD 000 808 190
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II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ K. DAMAGE TO FAUNA 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION (Include name(s) of species)

None identified.

01 ☐ L. CONTAMINATION OF FOOD CHAIN 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

None identified.

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPS ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None identified.

III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

None.

V. SOURCES OF INFORMATION (Cite specific references; e.g., state files, sample analysis, reports)

U.S. EPA Region 5 files, Illinois Environmental Protection Agency files.

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Amerock Corporation
Rockford, Illinois
ILD 000 806 190

Date: December 17, 1991

Facility Representatives: Phil Bell, Environmental Engineer
Larry Swacina, Manager - Environmental Compliance and Protection

Inspection Team: Mike Gorman, Resource Applications, Inc. (RAI)
Laura Czajowski, RAI

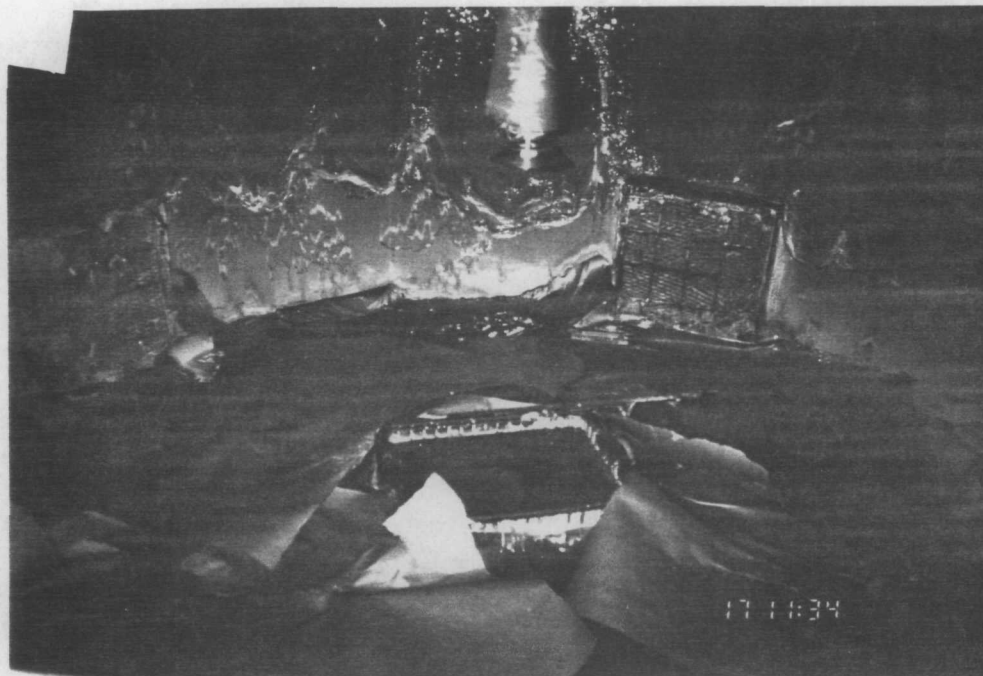
Photographer: Laura Czajowski, RAI

Weather Conditions: Windy, overcast, temperature about 50°F.

Summary of Activities: The visual site inspection (VSI) began at 9:15 a.m. with an introductory meeting. The inspection team discussed the purpose of the VSI and the agenda for the visit. Facility representatives then discussed Amerock's past and current operations, solid wastes generated, and release history. Most of the information was exchanged on a question-and-answer basis. Amerock representatives provided the inspection team with copies of documents requested.

The VSI tour began at 11:10 a.m. The tour started on the sixth floor of the building. The second and the first floor were toured next. We then went outside to see how far the Rock River was from the facility.

The tour concluded at 12:35 p.m., after which, the inspection team held an exit meeting with Phil Bell. The VSI was completed and the inspection team left the facility at 1:45 p.m.



Photograph No. 1

Orientation: Southwest

Location: SWMU 1

Date: 12/17/91

Description: This is the electrostatic paint spray booth where waste MEK (F005) is accumulated in a 5-gallon pan. This is on the sixth floor.



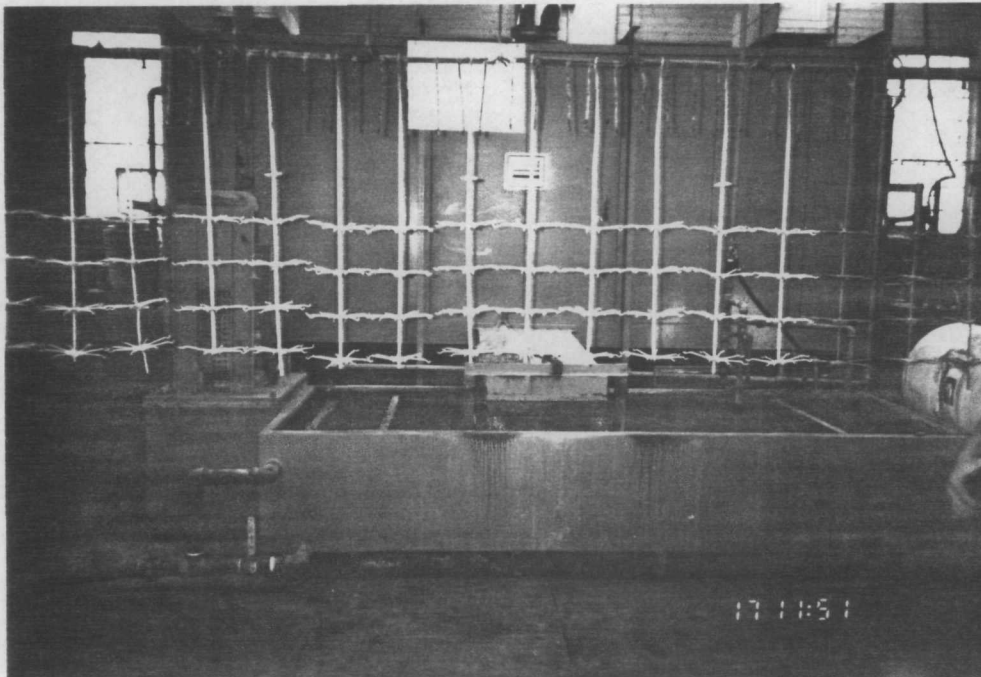
Photograph No. 2

Orientation: South

Location: SWMU 1 and 4

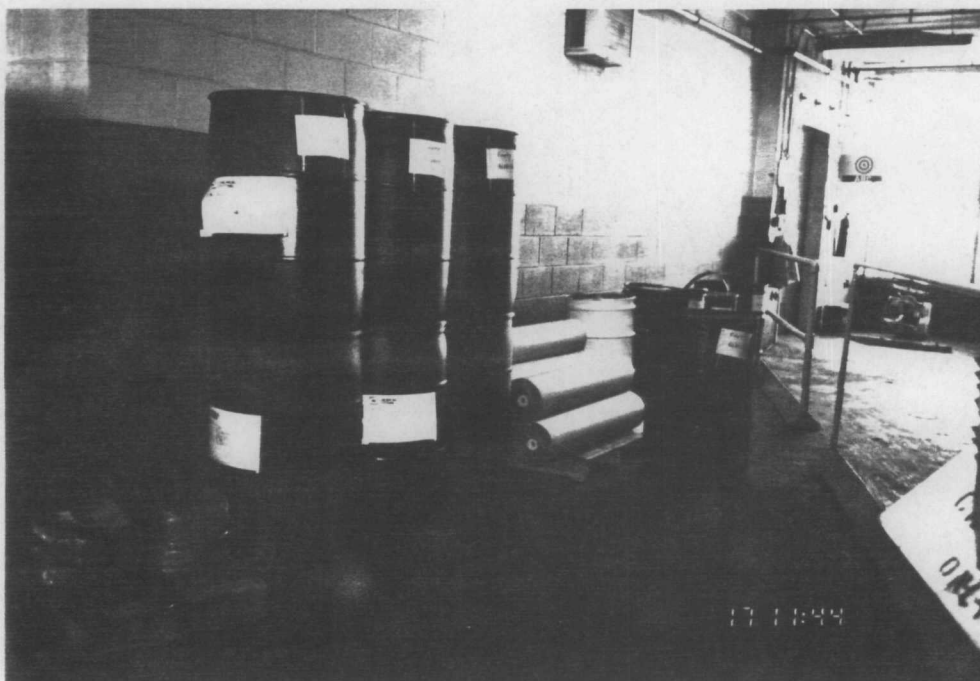
Date: 12/17/91

Description: On the left is the accumulation of hazardous chromate waste. The two drums on the right are nonhazardous phosphate and cleaner waste.



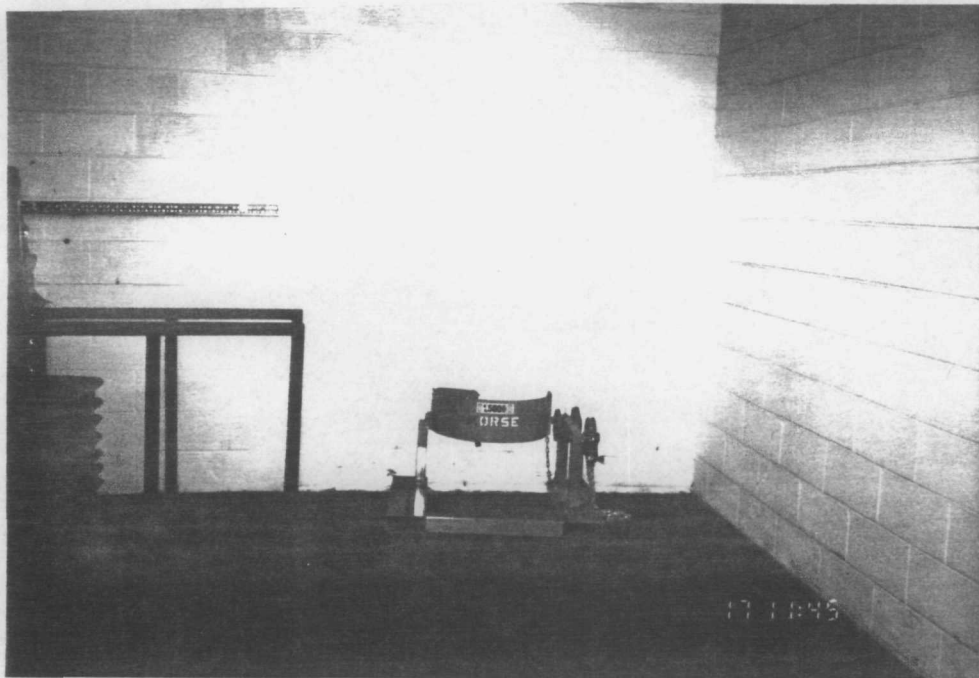
Photograph No. 3
 Orientation: South
 Description: This is the burn-off oven where ash is accumulated.

Location: SWMU 4
 Date: 12/17/91



Photograph No. 4
 Orientation: North
 Description: This is a RCRA-closed drum storage area. It currently stores empty drums and rolls of paper.

Location: SWMU 8
 Date: 12/17/91



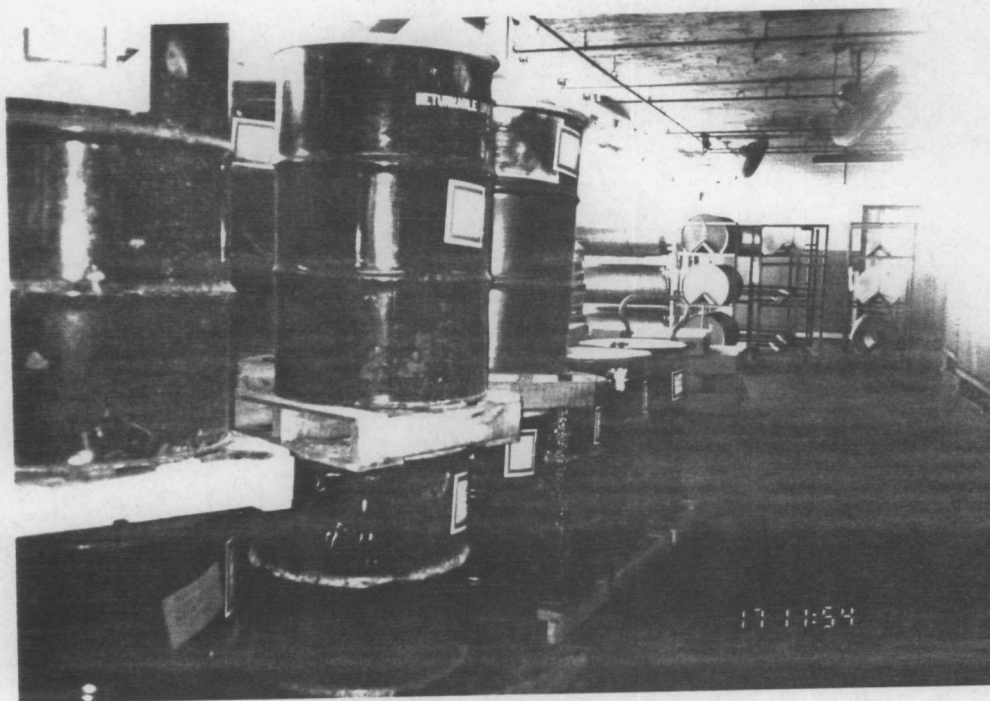
Photograph No. 5
 Orientation: North
 Description: This is a RCRA-closed drum storage area.

Location: SWMU 7
 Date: 12/17/91



Photograph No. 6
 Orientation: West
 Description: This is the Hazardous Waste Container Storage Area. It also stores product paint.

Location: SWMU 5
 Date: 12/17/91



Photograph No. 7

Orientation: South

Description: These are drums of parts coating waste. They are manifested out as special waste.

Location: SWMU 2

Date: 12/17/91



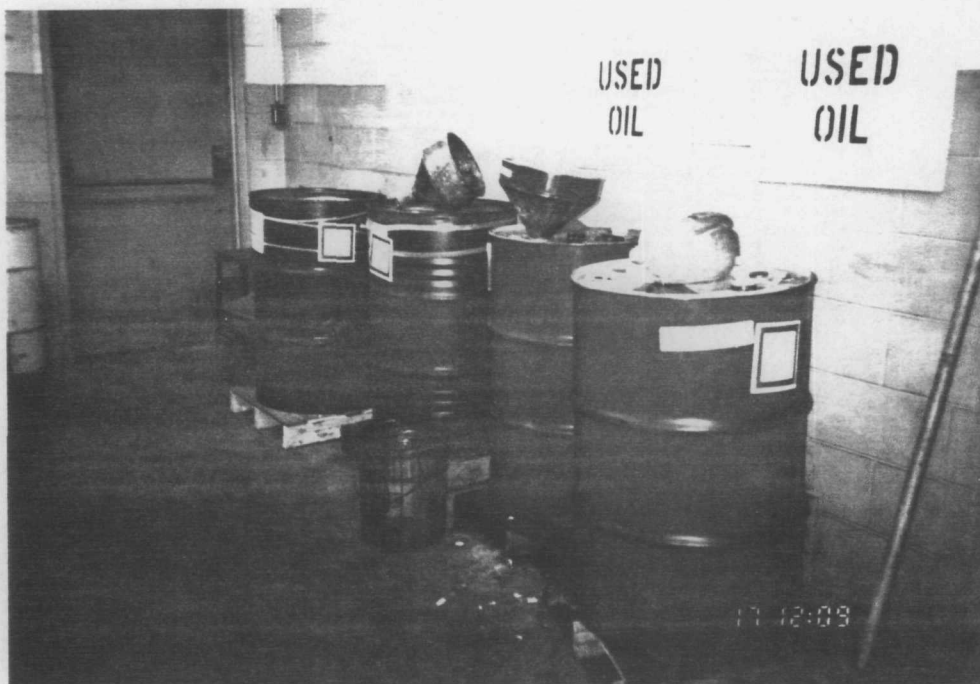
Photograph No. 8

Orientation: West

Description: These are spent batteries that are to be picked up or recharged. This is located on the first floor.

Location: SWMU 6

Date: 12/17/91



Photograph No. 9
 Orientation: Southeast
 Description: This is where waste oil is accumulated.

Location: SWMU 3
 Date: 12/17/91



Photograph No. 10
 Orientation: Northwest
 Description: These are five full waste oil drums waiting to be shipped out. This is located on the second floor.

Location: SWMU 3
 Date: 12/17/91

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

AMEROCK

30°F, overcast

9:15 am. met with Phil Bell, Env. engineer
Larry Swacina, Env. comp. + prot.

Main Street facility began in 1929 -
hardware plant that occupied 1 floor
in a 13 story building.

in the 1960's owned all 13 stories.

used to do:

- Stamping steel parts
- molding
- zinc die casting parts
- degreasing - TCA
- painting
- lacquering

moved some operations over to the 4000 Auburn
plant - specifically

- Stamping steel parts
- molding
- zinc die casting parts

small operation of assembly - thread parts
and screw it together.

Hazardous operations are the painting
6th floor - former drum storage areas

JL 12/17/91 142

AMEROCK

Employs 350 people - 3 shifts
6 days a week

potential receptors

plant 2 blocks away from the
Rock River.

2 entrances to building -

office entry

building entry

locked building use key cards for
access.

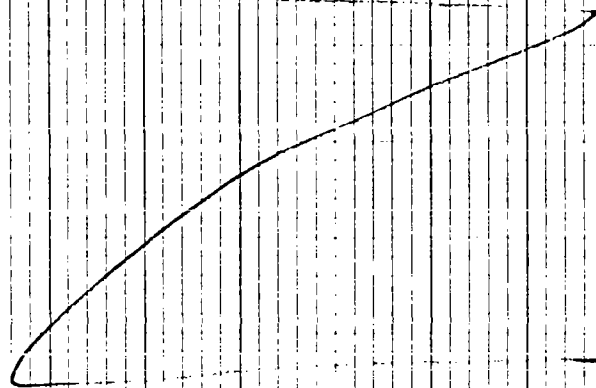
24 hour guard security

3 operations at plant

1. ASSEMBLY

2. Painting

3. Storage



JL 12/17/91 143

AMEROCK

pretreatment painting



phosphate

chromate

baths



spray wash



dry off
ovens



electro static
booths (2)



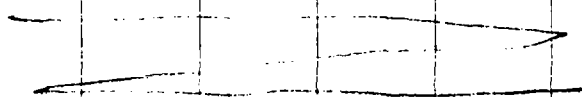
bake off oven



burn off
unit



→ ASH special waste



JK

12/17/91 144

AMEROCK

Amerock purchased by Newell in 1987

Same process but altered a little—

Brass

Steel

Zinc

No releases or spills on site.

No wastewater treatment system.

Water monitored by Rockford Sanitary
District

Amerock monitors water daily

for: zinc
chrome

No wells on property

get their water from Rockford City

No landfills or lagoons on site

Waste oil - 2nd floor

3 container storage areas

1 in use

Waste oil - 2nd floor

waste from incinerator

JK

12/17/91 145

AMEROCK

base dimension of building
1 block by 1 block
155 ft by 155 ft

* Could you send us a copy of permit
and notification

phosphate process > corrosion resistance
chromate

Electro Static Spray Booths -

55-gallon drums to pump - parts on rack
overspray on filters - special wastes.
passed TCEP testing - Exhaust ventilation pulls paint into filters

occasional drum of MERK - hazardous
stored on 6th floor in Storage Area
used to clean the disks in
spray booths

Sodium hydroxide Cleaner pH 11
sprayed on parts on conveyor

Cleaner Solids - Chem Waste Management
of Alsip, ILLINOIS

JC 12/17/91 146

AMEROCK

Chromate solid - Chem Waste Management

Chromate liquid - FW GSX LADLOW ENVIRON
Brought to Auburn Facility
for treatment.

Chromate liquid

1990 - 1,045 gallons

1989 - 55 gallons

paint spray parts - filters collect
residual paint

transported by PDC - peoria disposal Co.
disposed by
goes to Clinton Landfill

1991 - 15 cubic yards

1990 - 3,850 gallons PDC

1989 - 5,060 gallons PDC

Commercial product paint - stored in 55 gal
drums

Receiving dock - take it to the 6th floor
stores both waste & product

hydraulic oils - used for different
assembly machines

riveting

JC 12/17/91 147

AMEROCK

Waste Oil Generation Rates -

1989 - NONE

1990 - 270 gallons

1991 - NONE

Commercial battery storage on 1st floor
used for lift trucks

Oil for routine maintenance goes
out with other waste oil.

Naphtha - Stoddard solvents for parts cleaning 140°F.
laquering process on Brass

Other zinc > paint instead
Steel of laquering

Burn off oven - over spray on hooks
of racks - remove racks onto skids
take to burn off oven - 1450°F

powder drops down into trough
powder shoveled into drums

~~7c Considered hazardous special waste~~

parts coating waste

+ incineration waste

Clinton Landfill

12/17/91 148

AMEROCK

introductory conference ended 10:55 am

Population of Rockford 140,000

11:10 am VSI TOUR BEGAN

Phil Bell

Fred Saur

Chuck Meyer

Rene Beak

AMEROCK

Stoddard solvents 2 foot by 3 foot

pan - Closed area

MAINTENANCE

1st floor - batteries, Stoddard solvents

2nd floor -

6th floor - former drum storage areas

No Floor Drains in building

PHOTOS

6th floor

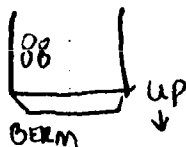
① Southwest paint spray booth
Solvent plastic tray

7c

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AMEROCK

- ② North
phosphate tank
secondary containment
- ③ South Chromate waste
2 drums 2 drums caustic
- ④ North triangular SDI storage unit
that was closed
- ⑤ North former storage area
6x12
- ⑥ West Hazardous Waste Drum Storage Area
staining on floor
Berm to prevent spill from
leaving area
- ⑦ Burn-off oven South
Ash collection
- ⑧ North Paint Booth Scrap
- ⑨ Berm sloping to South
Peel off paint



for 12/17/91 150

AMEROCK

1st Floor

- ⑩ West Batteries waiting to be
recharged or traded in for new
ones. 2 per year
wood block floor coated w/ creosol

⑪ West Machine Parts Cleaner 2nd floor

- ⑫ Southeast 21x26 ft
Accumulating waste oil
3 drums open
pool of oil in middle of floor

- ⑬ 5 full ones Northwest
Cement floor

12:35 tour ended
went back to
Auburn St facility
for exit meeting

for 12/17/91 151

AMEROCK

N - Downtown Commercial
E - Rock River
S - Commercial
W - Commercial / Residential

Chromic acid - (D002/D007)
phosphoric acid - (D002)

two areas went through closure

1st 28' ft x 12' ft - D002, D007 1987-89

2nd - 12 ft x 36 ft D002 spent alkaline cleaner
F005 waste paint thinner
toluene, MEK

3rd - former storage area
12 ft x 6 ft

NPDES PERMIT is for 8 run-off from
roof of building

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